

# **EXHIBIT B**

DEFENSE RESPONSES FOR JENNIFER ALTIER					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
8/2/2018	22	7	23	6	Response: There is no corresponding designation within the objection range. Testimony related to education grants is relevant because it shows independence between drug manufacturers and third-party organizations.
8/2/2018	44	5	44	13	Response: There is no corresponding designation within the objection range. The witness's personal knowledge of fentanyl products is relevant to her credibility and her work at Actavis.
8/2/2018	45	17	45	21	Response: There is no corresponding designation within the objection range. Testimony related to which products were manufactured Actavis, as opposed to Alpharma, is relevant to liability.
8/2/2018	62	23	63	24	Response: There is no corresponding designation within the objection range. The line of questioning does not ask for hearsay, the line of questioning goes to the organizational structure of Actavis and the witness's job duties.
8/2/2018	182	1	182	6	Response: There is no corresponding designation within the objection range. The purpose of the advisory board is relevant to the issue of Defendants working with "key opinion leaders."

OBJECTION TO PLAINTIFFS' COUNTERS FOR JENNIFER ALTIER					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
8/2/2019	20	10	20	20	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony. Designation is also vague and lacks foundation.
8/2/2019	33	3	33	20	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
8/2/2019	251	23	252	3	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
8/2/2019	263	22	263	24	Objection to Plaintiffs' Counter: The question misstates the document and the counter is an improper designation: it is unrelated to any previously designated testimony and is a mere attempt by Plaintiffs to designate testimony which should have been
8/2/2019	264	4	264	10	Objection to Plaintiffs' Counter: The question misstates the document and the counter is an improper designation: it is unrelated to any previously designated testimony and is a mere attempt by Plaintiffs to designate testimony which should have been
8/2/2019	264	11	264	14	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony and is a mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.

DEFENSE RESPONSES FOR NANCY BARAN					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
12/11/2018	118	8	119	6	Response: There is no corresponding designation from 118:21-119:6. The line of questioning does nt ask for hearsay or information that the witness lacks a foundation for because it asks for the witness's personal understanding of what "Actavis Per4ma" is and asks about the witness's personal experience in completing self-evaluations.
12/11/2018	315	11	317	5	Response: There is no corresponding designation within the objection range. The line of questioning seeks facts from the witness's personal recollection of a meeting she attended and related communications--for this reason, it is not argumentative, is not outside the witness's foundation of knowledge, and does not seek hearsay.

OBJECTION TO PLAINTIFFS' COUNTERS FOR NANCY BARAN					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
12/11/2018	138	17	139	22	Objection to Plaintiffs' Counter: 3) Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	162	17	165	8	Objection to Plaintiffs' Counter: 2) Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
12/11/2018	165	15	166	7	Objection to Plaintiffs' Counter: The question misstates prior testimony. It is an improper counter designation because it is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
12/11/2018	167	5	168	10	Objection to Plaintiffs' Counter: Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
12/11/2018	171	15	172	22	Objection to Plaintiffs' Counter: Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
12/11/2018	228	18	231	24	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	232	1	236	23	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	236	24	238	18	Objection to Plaintiffs' Counter: CMP, AF, MD. Additionally, it is an improper counter designation because it is unrelated to any previously designated testimony.
12/11/2018	238	19	239	20	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	239	21	241	1	Objection to Plaintiffs' Counter: AA. Additionally, it is an improper counter designaiton because it is unrelated to any previously designated testimony.
12/11/2018	241	2	244	23	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	241	2	246	4	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	249	21	250	8	Objection to Plaintiff's Counter: 2) Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
12/11/2018	252	4	252	19	Objecion to Plaintiffs' Counter: MD; CMP; 602
12/11/2018	258	22	259	15	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	259	16	260	24	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	259	16	261	2	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	261	1	267	4	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	262	3	267	4	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	269	6	270	14	Objection to Plaintiffs' Counter: Overbroad.

OBJECTION TO PLAINTIFFS' COUNTERS FOR NANCY BARAN					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
12/11/2018	275	18	291	10	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	292	16	295	22	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	296	15	305	15	Objection to Plaintiffs' Counter: Counter is unrelated to any previously designated testimony.
12/11/2018	305	16	306	16	Objection to Plaintiffs' Counter: AA, VG. 3) Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	314	19	315	11	Objection to Plaintiffs' Counter: 602; 3) Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	315	12	319	3	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	319	15	319	22	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
12/11/2018	320	12	321	16	Objection to Plaintiffs' Counter: Counter is unrelated to any previously designated testimony.
12/11/2018	322	3	322	12	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	322	3	322	15	Objection to Plaintiffs' Counter: Overbroad.
12/11/2018	322	13	335	20	Objection to Plaintiffs' Counter: Counter is unrelated to any previously designated testimony.

DEFENSE RESPONSES FOR JEANNETTE BARRETT					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
11/2/2018	19	6	20	7	Response: The witness's job experience is relevant to witness's background, foundation for testimony and credibility.
11/2/2018	20	8	21	9	Response: The witness's knowledge of the terms "pharmacovigilance" and "adverse events" are relevant to her credibility and work at Actavis.
11/2/2018	22	6	23	7	Response: The testimony is relevant to the witness's knowledge and experience in pharmacovigilance, which relates to her job duties.
11/2/2018	24	4	24	20	Response: The witness's understanding of the responsibilities of the medical affairs department is relevant to her credibility and job description.
11/2/2018	25	11	25	19	Response: The witness's job experience is relevant to her credibility.
11/2/2018	29	5	29	16	Response: The witness's educational background is relevant to her credibility.
11/2/2018	30	10	30	21	Response: The witness's education and training is relevant to her background, foundation for testimony and credibility.
11/2/2018	31	12	33	2	Response: The witness's job experience is relevant to her background, foundation for testimony and credibility.
11/2/2018	35	12	35	14	Response: The witness's job experience is relevant to her credibility and work at Actavis.
11/2/2018	35	12	35	15	Response: The witness's job experience is relevant to her credibility and work at Actavis.
11/2/2018	36	11	37	1	Response: The line of questioning is relevant because it directly addresses her job duties at Actavis, which is relevant to witness's background, foundation for testimony and credibility.
11/2/2018	37	2	37	15	Response: The witness's job experience is relevant to her credibility.
11/2/2018	44	6	44	13	Response: The witness's job experience is relevant to her credibility.
11/2/2018	45	16	45	21	Response: The witness's job experience is relevant to her background, foundation for testimony and credibility.
11/2/2018	63	1	63	14	Response: The witness's job description is relevant to her credibility and her work at Actavis; provides foundation for testimony.
11/2/2018	63	15	63	23	Response: The size of the witness's department is relevant to her job description at Actavis.
11/2/2018	182	2	182	5	Response: The question of whether an opioid product is supported by medical science liasons is relevant to marketing.
11/2/2018	183	11	184	1	Response: The question of the function of the promotional review committee is relevant to plaintiffs' claims related to marketing and compliance.

DEFENSE RESPONSES FOR JEANNETTE BARRETT					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
11/2/2018	248	20	249	8	Response: The circumstances under which the witness was terminated from Actavis are relevant to the witness's credibility.
11/2/2018	251	18	251	22	Response: The witness's involvement with generic drugs at Actavis is relevant to her work at Actavis.
11/2/2018	262	19	263	21	Response: Questioning about the studies conducted with Kadian (an opioid product) that supported FDA approval is relevant because it relates to FDA approval and efficacy of the drug.
11/2/2018	266	19	267	3	Response: The witness's job experience is relevant to her background, foundation for testimony and credibility.
11/2/2018	267	4	268	21	Response: The witness's personal experience with opioids is relevant to credibility.
11/2/2018	270	21	271	12	Response: The witness's job experience is relevant to her background, foundation for testimony and credibility.
11/2/2018	286	2	286	8	Response: The question of whether the witness observed improper conduct at Actavis is relevant to all of plaintiffs' claims against this defendant.



OBJECTION TO PLAINTIFFS' COUNTERS FOR JEANNETTE A. BARRETT					
DEPO DATE	Objection to Plaintiffs' Counters				
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11/2/2018	51	1	51	13	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
11/2/2018	63	24	64	23	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated. Counter unrelated to any previously designated testimony.
11/2/2018	65	7	65	10	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated. Counter unrelated to any previously designated testimony.
11/2/2018	67	3	67	12	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated. Counter unrelated to any previously designated testimony.
11/2/2018	260	9	261	23	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is unrelated to any previously designated testimony.
11/2/2018	268	22	269	10	Objection to Plaintiffs' Counter: 402, Overbroad.
11/2/2018	269	11	270	20	Objection to Plaintiffs' Counter: 402 and Improper Counter Designation because counter is unrelated to any previously designated testimony.
11/2/2018	271	13	274	21	Objection to Plaintiffs' Counter: Overbroad.

DEFENSE RESPONSES FOR DOUGLAS BOOTHE					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/17/2019	362	23	364	7	Response: Objection does not correspond with designated testimony. Designated testimony regarding Defendants' relationship with key opinion leaders is relevant to plaintiffs' liability claims against defendants (i.e. RICO, improper promotion).

OBJECTION TO PLAINTIFFS' COUNTERS FOR DOUGLAS BOOTHE					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/17/2019	169	12	170	16	Objection to Plaintiffs' Counter: Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
1/17/2019	173	13	175	4	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.

DEFENSE RESPONSES FOR ANDREW BOYER					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/15/2019	404	14	405	3	Response: Not overbroad or vague because the questions seek to clarify prior testimony and establish a foundation for further testimony. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury as designated testimony clarifies and contextualizes preceding designated testimony.
1/15/2019	405	6	405	9	Response: Not overbroad or vague because the questions seek to clarify prior testimony and establish a foundation for further testimony. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury as designated testimony seeks to clarify and contextualize preceding designated testimony.
1/15/2019	405	12	405	16	Response: Not overbroad or vague because the questions seek to clarify prior testimony and establish a foundation for further testimony. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because designated testimony clarifies and contextualizes preceding designated testimony.
1/15/2019	405	19	406	11	Response: Not overbroad or vague because the questions establish a foundation for further testimony. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because questions ask for specific information regarding witness's recollection of Defendants' business activities.
1/15/2019	406	14	406	14	Response: Not overbroad or vague because the questions establish a foundation for further testimony. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because questions ask for specific information regarding witness's recollection of Defendants' business activities.

DEFENSE RESPONSES FOR ANDREW BOYER					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/15/2019	406	18	406	22	Response: Not overbroad or vague because the question asks for specific information regarding the occurrence of detailing of generic opioids at Actavis. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because questions ask for specific information regarding witness's recollection of Defendants' business activities.
1/15/2019	407	13	407	21	Response: Not overbroad or vague because the questions ask for specific information regarding sponsorship of CMEs for generic products at Actavis and Teva. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because questions ask for specific information regarding witness's recollection of Defendants' business activities.
1/15/2019	407	24	408	9	Response: Not overbroad or vague because the question asks for specific information regarding the sponsorship of CMEs at Actavis and Teva. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because questions ask for specific information regarding witness's recollection of Defendants' business activities.
1/15/2019	408	18	409	23	Response: Not overbroad or vague because the question asks for specific information regarding Defendants' relationship to third parties and Defendants' detailing since 1998. Does not lack foundation because asks question within scope of personal knowledge and experience of witness. Foundation laid for witness's knowledge and experience in preceding testimony. Not confusing to the jury because questions ask for specific information regarding witness's recollection of Defendants' business activities.

OBJECTION TO PLAINTIFFS' COUNTERS FOR ANDREW BOYER					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/15/2019	169	9	169	17	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; Counter is unrelated to any previously designated testimony
1/15/2019	169	19	170	8	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; Counter is unrelated to any previously designated testimony
1/15/2019	204	4	204	21	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; counter is unrelated to any previously designated testimony.
1/15/2019	206	1	206	5	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; counter is unrelated to any previously designated testimony.
1/15/2019	225	8	226	10	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; MPT; 403
1/15/2019	349	18	349	18	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated

DEFENSE RESPONSES FOR MICHAEL CLARKE					
DEPO DATE	DEFENDANTS' RESPONSES				
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12/7/2018	28	6	30	5	Response: Witness's membership in professional organizations is relevant to credibility. Defendants' relationship with third party organizations is relevant to causation.
12/7/2018	143	1	143	9	Response: Testimony from the VP of compliance regarding messages from DEA, the key regulator responsible for enforcing the law, is relevant to scienter, causation, and credibility. Hearsay not offered for truth of matter asserted, but effect on listener and timing.
12/7/2018	221	13	222	9	Response: Questions are not argumentative because they seek factual information regarding suspicious order monitoring protocols. Does not lack foundation because questions relate to facts within the witness's personal knowledge. Foundation laid for witness's knowledge and experience in preceding testimony.

## OBJECTION TO PLAINTIFFS' COUNTERS FOR MICHAEL CLARKE

DEPO DATE	Objection to Plaintiffs' Counters				
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12/7/2018	143	14	145	6	Objection to Plaintiffs' Counter: Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; Counter is unrelated to any previously designated testimony



DEFENSE RESPONSES FOR MATTHEW DAY					
DEPO DATE	DEFENDANTS' RESPONSES				
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1/4/2019	110	12	110	19	Response: Training regarding abuse, misuse, etc. relates directly to the Controlled Substances Act and therefore is responsive.
1/4/2019	183	20	184	12	Response: Witness is discussing the sales training provided which is directly responsive to the question asked. The witness has firsthand knowledge of the trainings provided and therefore the answer is not speculative.
1/4/2019	366	19	367	16	Response: The question refers specifically to a particular series of promotional materials the witness developed, which were discussed earlier in the deposition. The question was not objected to and it was effective as a means of communicating the line of questions that the witness answered specifically and clearly.

OBJECTION TO PLAINTIFFS' COUNTERS FOR MATTHEW DAY					
DEPO DATE	Objection to Plaintiffs' Counters				
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1/4/2019	54	19	54	21	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
1/4/2019	55	13	55	20	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
1/4/2019	82	21	83	4	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
1/4/2019	90	20	91	12	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; Overbroad; 602
1/4/2019	91	14	91	24	Objection to Plaintiffs' Counter: Improper counter designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; Overbroad; 602
1/4/2019	92	2	92	8	Objection to Plaintiffs' Counter: Improper counter designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	100	15	100	20	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	100	22	101	10	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	101	12	101	19	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	101	21	103	23	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602; overbroad
1/4/2019	110	20	111	18	Objection to Plaintiffs' Counter: Overbroad; 602
1/4/2019	119	1	120	7	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	121	21	122	5	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	122	23	123	4	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	124	1	125	22	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	125	24	126	1	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	136	1	136	13	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602

OBJECTION TO PLAINTIFFS' COUNTERS FOR MATTHEW DAY					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/4/2019	143	22	144	22	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	167	14	167	14	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; INC
1/4/2019	181	16	181	23	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated
1/4/2019	182	15	182	21	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/4/2019	270	23	272	21	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602

DEFENSE RESPONSES FOR NATHALIE LEITCH					
DEPO DATE	DEFENDANTS' RESPONSES				
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1/22/2019	21	8	22	17	Response: This line of questioning relates to statements on the witness's resume about her work on the drugs at issue in this case and therefore it is relevant.
1/22/2019	44	20	45	14	Response: Discussing targets of sales force for drug at issue in this case so directly relevant.

OBJECTION TO PLAINTIFFS' COUNTERS FOR NATHALIE LEITCH					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/22/2019	76	13	78	8	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602; INC
1/22/2019	100	20	101	1	Objection to Plaintiffs' Counter: 602; AA
1/22/2019	101	5	103	19	Objection to Plaintiffs' Counter: Overbroad; 602; AA; MPT

DEFENSE RESPONSES FOR JINPING MCCORMICK					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/9/2019	187	12	187	14	Response: Suspicious order monitoring, and types of data used in SOM system, is directly relevant to the issues (i.e. liability, causation) in this case. The question is clear and contains no argument.
1/9/2019	187	19	189	18	Response: Suspicious order monitoring, and types of data used in SOM system, is directly relevant to the issues (i.e. liability, causation) in this case. The questions are clear and contain no argument.
1/9/2019	226	5	227	23	Response: Suspicious order monitoring is directly relevant to the issues (i.e. liability, causation) in this case.

## OBJECTION TO PLAINTIFFS' COUNTERS FOR JINPING McCORMICK

DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/9/2019	20	10	20	20	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602; INC

DEFENSE RESPONSES FOR COLLEEN MCGINN					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
12/14/2018	129	5	130	21	Response: Responsive because witness explains that duties and responsibilities under DEA regulations exist, but are subject to shifting interpretations. Answer is not speculative and has foundation because answer reflects personal knowledge and experience of the witness. Foundation regarding knowledge and experience in preceeding testimony.



DEFENSE RESPONSES FOR DAVID MYERS					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
12/13/2018	103	6	105	18	Response: Relevant to understanding corporate ownership and responsibility for Anda entity and related distribution of opioid products.
12/13/2018	114	21	115	19	Response: Relevant to differentiating advertising between brand and generic products.
12/13/2018	183	21	186	4	Response: Objection does not correspond with designated testimony. The examination is not argumentative in that the questions seek, and the responses provide, factual testimony.

OBJECTION TO PLAINTIFFS' COUNTERS FOR DAVID A. MYERS					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
12/13/2018	185	14	185	22	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
12/13/2018	368	4	368	9	Objection to Plaintiffs' Counter: VG; HYP; 602

DEFENSE RESPONSES FOR THOMAS NAPOLI					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/17/2019	88	2	89	5	Response: Relevant to explaining processes for suspicious order monitoring, which is directly relevant to plaintiffs' claims against defendants.
1/17/2019	341	5	343	17	Response: Relevant to company and witness's views on suspicious order monitoring and internal controls.

OBJECTION TO PLAINTIFFS' COUNTERS FOR THOMAS P. NAPOLI					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/17/2019	113	21	118	7	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/17/2019	193	19	195	9	Objection to Plaintiffs' Counter: 602
1/17/2019	196	20	197	18	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/17/2019	197	21	198	24	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/17/2019	199	3	199	17	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/17/2019	200	6	202	15	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/17/2019	202	18	203	18	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated; 602
1/17/2019	218	15	223	21	Objection to Plaintiffs' Counter: Overbroad

DEFENSE RESPONSES FOR TERRI NATALINE					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
12/13/2018	257	24	258	9	Response: Witness's compensation is relevant to background and position at Actavis.
12/13/2018	276	5	278	19	Response: Objection does not correspond to designated testimony. Designated testimony is relevant to Actavis acquisition of Kadian.

DEFENSE RESPONSES FOR MICHAEL PERFETTO					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
12/18/2018	118	8	119	5	Response: There is no hearsay testimony offered or elicited. The witness worked at Actavis and attended site visits, and therefore has personal knowledge of the site visits about which he is being asked.
12/18/2018	315	11	317	3	Response: There are no hearsay statements made or elicited in this line of questioning. The witness's personal knowledge of marketing (or lack thereof) of generics at Actavis is based on upon his experiences and career at Actavis. The questions and responses are not argumentative and are factual in nature.

OBJECTION TO PLAINTIFFS' COUNTERS FOR MICHAEL PERFETTO					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
12/18/2018	109	22	109	24	Objection to Plaintiffs' Counter: INC
12/18/2018	110	11	111	9	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated. Counter is unrelated to any previously designated testimony.
12/18/2018	116	3	118	7	Objection to Plaintiffs' Counter: Improper Counter Designation. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated. Counter is unrelated to any previously designated testimony.
12/18/2018	119	5	119	8	Objection to Plaintiffs' Counter: VG
12/18/2018	120	24	121	8	Objection to Plaintiffs' Counter: 602; VG
12/18/2018	121	10	122	3	Objection to Plaintiffs' Counter: ARG; 602; HYP

DEFENSE RESPONSES FOR SARITA THAPAR					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/10/2019	100	24	101	20	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. FDA inspections of the pharmacovigilance department are relevant to government oversight and involvement in regulating opioids and other controlled substances, which is relevant to the parties claims and defenses.
1/10/2019	102	23	103	11	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations.
1/10/2019	106	6	106	19	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations.
1/10/2019	107	18	109	4	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations.
1/10/2019	109	23	111	16	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations and internal SOPs related to adverse event reporting.
1/10/2019	140	15	141	6	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations.
1/10/2019	204	2	205	8	Response: The line of questioning goes to handling of drug safety and adverse event reporting, which is relevant to the parties' claims and defenses.
1/10/2019	243	13	243	16	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations and internal SOPs related to adverse event reporting.
1/10/2019	247	8	247	10	Response: Whether and what branded opioids Actavis manufactured/distributed/sold is relevant to plaintiffs' claims.
1/10/2019	270	2	270	4	Response: Whether Actavis audited the activities of third-party pharmacovigilance and other entities it retained is relevant to plaintiffs' claims.



DEFENSE RESPONSES FOR SARITA THAPAR					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/10/2019	284	21	286	8	Response: Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations and internal SOPs related to adverse event reporting.
1/10/2019	288	4	290	24	Response: Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations and internal SOPs related to adverse event reporting.
1/10/2019	310	13	312	15	Response: Witness's testimony is based on witness's personal knowledge acquired during career at Actavis. Testimony is relevant to Actavis's maintenance of pharmacovigilance department and efforts to comply with relevant government regulations and internal SOPs related to adverse event reporting.

OBJECTION TO PLAINTIFFS' COUNTERS FOR SARITA THAPAR					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/10/2019	46	7	47	6	Objection to Plaintiffs' Counter: 402; 403
1/10/2019	218	17	219	23	Objection to Plaintiffs' Counter: VG; INC

DEFENSE RESPONSES FOR MARY WOODS					
DEPO DATE	DEFENDANTS' RESPONSES				
	Begin Page at	Begin Line at	End Page at	End Line at	Defendants' Responses
1/10/2019	127	6	127	22	Response: Testimony is factual, and not argumentative. Testimony is relevant to suspicious order monitoring system process at Defendant company.
1/10/2019	139	4	140	9	Response: Testimony is relevant to operation of suspicious order monitoring system at Defendant entity, which is related to plaintiffs' claims against defendant at relevant time.

OBJECTION TO PLAINTIFFS' COUNTERS FOR MARY WOODS					
DEPO DATE	Objection to Plaintiffs' Counters				
	Begin Page at	Begin Line at	End Page at	End Line at	Objection to Plaintiffs' Counters
1/10/2019	20	17	25	8	Objection to Plaintiffs' Counter: Improper Counter Designation. Overbroad. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated. Counter is unrelated to any previously designated testimony.
1/10/2019	21	2	21	11	Objection to Plaintiffs' Counter: VG
1/10/2019	21	12	22	4	Objection to Plaintiffs' Counter: VG; LC
1/10/2019	22	5	22	15	Objection to Plaintiffs' Counter: VG
1/10/2019	24	3	24	8	Objection to Plaintiffs' Counter: VG
1/10/2019	86	15	86	24	Objection to Plaintiffs' Counter: VG
1/10/2019	87	11	87	24	Objection to Plaintiffs' Counter: VG
1/10/2019	87	11	89	24	Objection to Plaintiffs' Counter: Improper Counter Designation. Overbroad. Counter is mere attempt by Plaintiffs to designate testimony which should have been affirmatively designated.
1/10/2019	88	1	88	12	Objection to Plaintiffs' Counter: VG
1/10/2019	88	15	88	21	Objection to Plaintiffs' Counter: VG
1/10/2019	88	22	89	4	Objection to Plaintiffs' Counter: VG
1/10/2019	89	5	89	11	Objection to Plaintiffs' Counter: VG
1/10/2019	89	12	89	22	Objection to Plaintiffs' Counter: VG; 602